

# **EXHIBIT A**



Sign out

Buy Sell My eBay Community Help

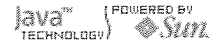
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All Categories

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Listed in  
category:

[Business & Industrial](#) > [Industrial Electrical & Test](#) > [Electronic Components](#)  
> [Other Electronic Components](#)

## TELEMECANIQUE LC1D25G7 CONTACTORS 5 UNITS NEW

Item number: 270142744712

(5) --- NEW LC1D25 G7 CONTACTORS 120 VAC COIL



This item has been paid through PayPal. Payment was sent to:  
[bill@electronicsolutionsinc.com](mailto:bill@electronicsolutionsinc.com) on Jul-10-07.

[Leave Feedback >](#)

To let other eBay users know what your experience has been with this seller, click the **Leave Feedback** button.

### Other actions for this item:

You can manage all your items in [My eBay](#) and do the following:

- [View Order Details](#)
- [View PayPal payment](#) for this item.
- ☒ [Contact Seller](#) about this item.

### Additional Options:

- To view other items from this seller, [view seller's other items](#).
- If this listing is similar to an item you want to sell, [list an item like this](#).
- You may [add this seller](#) to your Favorite Sellers in My eBay.



1 of 2

[View larger picture](#)

Sold for: **US \$100.00**  
Auction ended early  
with Buy It Now.

Ended: **Jul-10-07 14:19:15 PDT**

Shipping costs: **US \$15.00**  
UPS Ground  
Service to [United States](#)

Ships to: Worldwide  
Item location: Plant City, Florida,  
United States

Quantity: 1 lot available  
(5 items each)

### Meet the seller

Seller: [123ambros](#) ( 771 ★ )

Feedback: **99.9% Positive**

Member: since Apr-24-00 in United States

[Read feedback comments](#)

[Ask seller a question](#)

[Add to Favorite Sellers](#)

[View seller's other items:](#)  
[Store](#) | [List](#)

Visit seller's Store:  
[E.S.I OF CENTRAL FLORIDA](#)

### Buy safely

#### 1. Check the seller's reputation

Score: 771 | 99.9% Positive  
[Read feedback comments](#)

Cost per item: US \$20.00 each  
(Not sold individually)  
History: [1 bid](#)  
Buyer: [tsutomu5qsz \( 94 ★](#)  
)

**2. Check how you're protected**

**PayPal** Up to \$2,000 in buyer protection. [See eligibility.](#)  
Returns: Seller accepts returns.  
[7 Days Money Back](#)

You can also: [Email to a friend](#)

**Listing and payment details: [Show](#)**

**Make no payments until 2008**  
on your first purchase over \$50 with the new eBay MasterCard! Plus, earn rewards toward future eBay purchase wherever you shop.  
[See details](#) | [Apply now](#)

**Description**

*Item Specifics - Item Condition*  
Condition: **New**

**(5) NEW IN THE BOX LC1D25 G7 TELEMECANIQUE CONTACTORS**

LC1D25G7	CONTACTOR
Motor voltage - three phase	200V AC, 230V AC, 460V AC, 575V AC
Horsepower	7.5 HP, 15 HP, 20 HP
AC coil	120V 50/60Hz
Max FLC (inductive)	25 Amps
No. of poles	4 pole
Internal auxiliary contacts	0 NO + 0 NC

*Other coil voltages available specify after auction, prior to shipping to make changes*

**Select a picture**





00022

[The power of protection from AOL and eBay. Learn more](#)

### Shipping and handling

#### **Ships to**

Worldwide

Country:

Shipping and Handling	To	Service
US \$15.00	United States	UPS Ground 1 to 6 business days*

\*Sellers are not responsible for service transit time. This information is provided by the carrier and excludes weekends and holidays. Note that transit times may vary, particularly during peak periods.

#### **Shipping insurance**

Not offered

### Return policy

Item must be returned within:	7 Days
Refund will be given as:	Money Back

## Payment details

### Payment method

### Preferred/Accepted

### Buyer protection on eBay



**Seller Preferred**

**PayPal** Up to \$2,000 in  
buyer protection.  
[See eligibility](#)

Money order/Cashiers check

Accepted

Not Available

Personal check

Accepted

Not Available

[Learn about payment methods](#)

### Seller's payment instructions

Shipping prices are for domestic customers only. If you are an international bidder you must contact us for a shipping total.

If customer send check item will ship after check has cleared.


Contact me with any questions prior to bidding.

## Helpful information

### eBay recommended services

PayPal is the safe way to pay online. Your financial information is never shared with sellers. Plus, you get [free PayPal Buyer Protection](#) on qualified listings.

## Other options

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Seller assumes all responsibility for listing this item.

[eBay Pulse](#) | [eBay Reviews](#) | [eBay Stores](#) | [Half.com](#) | [eBay Express](#) | [Austria](#) | [China](#) | [France](#) | [Germany](#) | [Italy](#) | [Spain](#) | [United Kingdom](#) | [Popular Searches](#)  
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**My Account**   **Send Money**   **Request Money**   **Merchant Services**   **Auction Tools**

**Overview**   **Add Funds**   **Withdraw**   **History**   **Resolution Center**   **Profile**

## Transaction Details

### eBay Payment Sent (ID # 3Y6131585R900923A)

**Total Amount:** -\$115.00 USD

**Date:** Jul. 10, 2007

**Time:** 16:20:00 PDT

**Status:** Completed

Item #	Item Title	Qty	Price	Subtotal
270142744712	TELEMECANIQUE LC1D25G7 CONTACTORS 5 UNITS NEW	1	\$100.00 USD	\$100.00 USD

Shipping & Handling via UPS Ground \$15.00 USD

**Note:** UPS cannot ship to P.O. Boxes  
(includes any seller handling fees):

Shipping Insurance : --

**Total:** \$115.00 USD

**Shipping Address:** tsutomu shimomura  
318 ski way  
incline village, NV 89451  
United States  
Confirmed

**Payment To:** WILLIAM AMBROS (The recipient of this payment is **Verified**)

**Seller's ID:** 123ambros

**Seller's Email:** BILL@ELECTRONICSOLUTIONSINC.COM

**Funding Type:** Credit Card

**Funding Source:** \$115.00 USD - Visa Card XXXX-XXXX-XXXX-6200

This transaction will appear on your bill as "PAYPAL \*BILL".

Original Transaction				
Date	Type	Status	Details	Amount
Jul. 10, 2007	Payment To WILLIAM AMBROS	Completed	...	-\$115.00 USD

Related Transaction				
Date	Type	Status	Details	Amount
Jul. 10, 2007	Charge From Credit Card	Completed	<a href="#">Details</a>	\$115.00 USD

Need help? If you have problems with a transaction or would like assistance settling a dispute with your seller, visit the [Resolution Center](#). PayPal strongly recommends attempting to resolve this issue directly with the merchant or seller whenever possible.

**Description:** TELEMECANIQUE LC1D25G7 CONTACTORS 5 UNITS NEW

**Note:** Please check for my message regarding coil voltages, etc., before shipping.

Thanks!

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[Information about FDIC pass-through insurance](#)

# **EXHIBIT B**



**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SQUARE D COMPANY and SCHNEIDER )		
ELECTRIC, S.A., )		
)		
Plaintiffs, )		
)		
v. )		CASE NO.: 07 C 6294
)		
ELECTRONIC SOLUTIONS, INC., and )		Judge James B. Moran
WILLIAM AMBROS, )		
)		
Defendants. )		
)		

**AFFIDAVIT OF JEFFREY A. MILLER**

Jeffrey A. Miller, being duly sworn upon oath, states as follows:

1. I am over eighteen (18) years of age and have personal knowledge of the matters set forth herein. If called upon to do so, I could and would competently testify as to those matters.

2. I am currently employed at Square D Company/Schneider Electric as a Senior Staff Mechanical Engineer. I obtained a degree in Industrial Engineering from North Carolina State University in 1975. I have been employed by Square D/Schneider Electric since 1981, and am currently employed as a Senior Staff Mechanical Engineer in the Product Engineering Department. As part of my regular duties, I support product designs for production, review failure modes of a product, analyze material changes, and revise design features for specific customer applications. Until 2007 I was the Department representative for Underwriters Laboratories and the Canadian Standards Association.

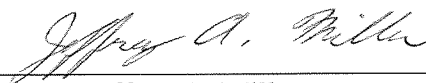
3. As part of my regular responsibilities at Square D/Schneider Electric, I inspect products returned from customers or distributors to analyze why the product failed.

4. I was asked to inspect five electrical contactors which I have been informed were sold by the Defendants and shipped to Square D by a customer in July 2007. I began with an external inspection, and compared the suspect devices to the known good device from Square D/Schneider, including the packaging. I then disassembled the devices and noted all differences. Based upon my inspection, I found two of the contactors to be counterfeit. Details of my inspection are set forth in my report. I prepared the report as part of my regular duties at Square D Company/Schneider Electric, and maintained the report as a business record in the ordinary course of business. The results and information set forth in Exhibit B-1 are true and accurate.

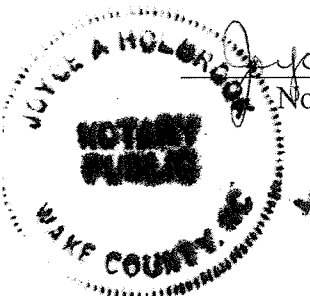
5. The counterfeit contactors sold by defendants were found to have non-conforming (as compared to authentic products) plastic, plastic moldings and contact material, non-conforming latches and tabs, improper hardware and assembly errors. These deficiencies are detailed in my report, attached as Exhibit B-1.

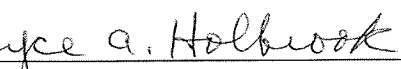
6. When counterfeit contactors are installed and subjected to an electrical load, their poor interior quality and inauthentic nature can lead to serious consequences. Due to the risk of fire or explosion, counterfeit contactors represent a significant and potentially serious risk of damage to electrical equipment and injury to anyone nearby. In addition, counterfeit contactors carry a risk of shortened electrical life, melting and/or jamming causing a motor or load to not shut off, and can lead to an electrical breakdown causing a short circuit.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Jeffrey A. Miller

Subscribed and sworn to  
before me this 17th day of January 2008.



  
\_\_\_\_\_  
Notary Public

*My commission expires  
Feb. 9, 2011*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SQUARE D COMPANY and SCHNEIDER	)	
ELECTRIC, S.A.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CASE NO.: 07 C 6294
	)	
ELECTRONIC SOLUTIONS, INC., and	)	Judge James B. Moran
WILLIAM AMBROS,	)	
	)	
Defendants.	)	
	)	

**AFFIDAVIT OF JEFFREY A. MILLER**

Jeffrey A. Miller, being duly sworn upon oath, states as follows:

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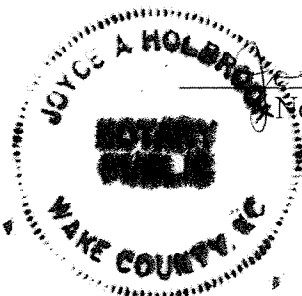
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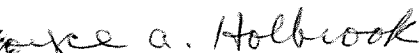
6. When counterfeit contactors are installed and subjected to an electrical load, their poor interior quality and inauthentic nature can lead to serious consequences. Due to the risk of fire or explosion, counterfeit contactors represent a significant and potentially serious risk of damage to electrical equipment and injury to anyone nearby. In addition, counterfeit contactors carry a risk of shortened electrical life, melting and/or jamming causing a motor or load to not shut off, and can lead to an electrical breakdown causing a short circuit.

FURTHER AFFIANT SAYETH NOT.

  
Jeffrey A. Miller

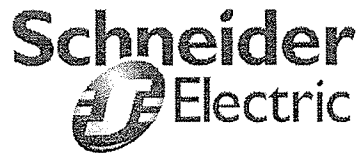
Subscribed and sworn to  
before me this 17<sup>th</sup> day of January 2008.



  
Notary Public

*my commission expires*  
*Feb. 9, 2011*

# **EXHIBIT B-1**

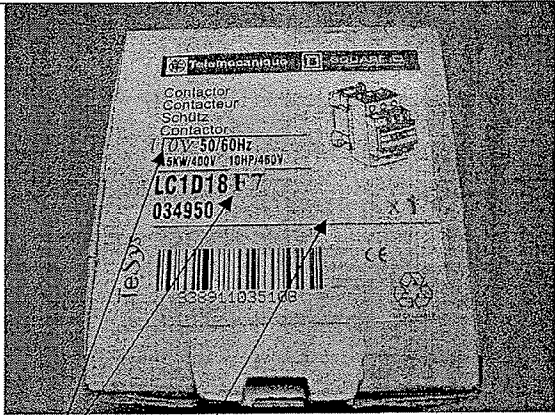


General:

The quality of the printing and molding is poor compared to the norm. The molded parts have a lot of flash and less detail.

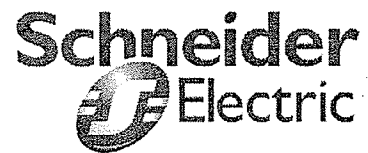
LEFT COLUMN =  
KNOWN LEGITIMATE DEVICE.

RIGHT COLUMN =  
SUSPECT COUNTERFIT DEVICE.

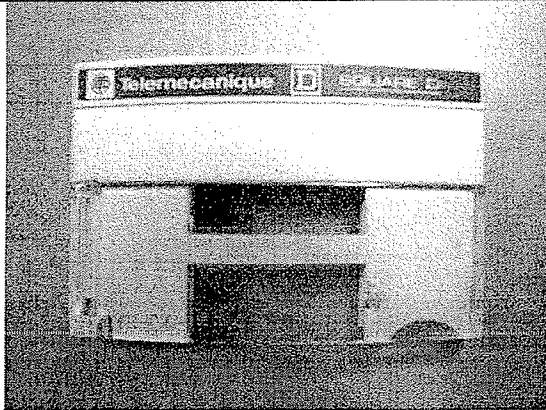
<p>Page 1 – Device #4</p> <p>No Photo of known good carton.</p>	
	<ol style="list-style-type: none"> <li>1. The coil voltage and voltage code have been changed via small stickers.</li> <li>2. Date Code and Country of Origin are missing.</li> </ol>

**Merlin Gerin**  
**Square D**  
**Telemecanique**

Schneider Electric  
North American Operating Division  
8001 Hwy. 64 East  
Knightdale, NC 27545-9023  
Tel 919-266-3671  
Fax 919-266-4460  
www.SquareD.com



Page 2 – Device #4

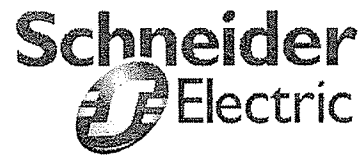


3

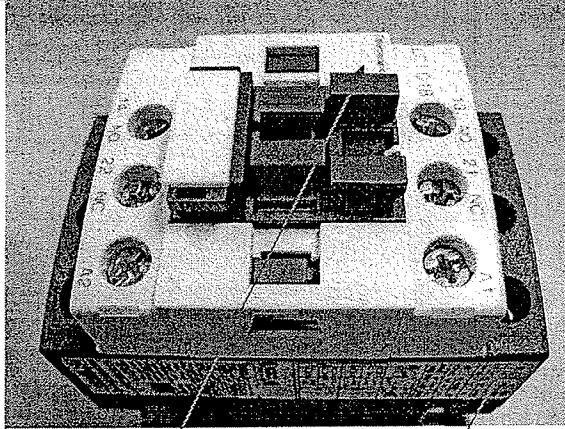
4

3. Cover has a split in the hinge that the normal device does not have.
4. Color is Pantone 300.





Page 3 – Device #4

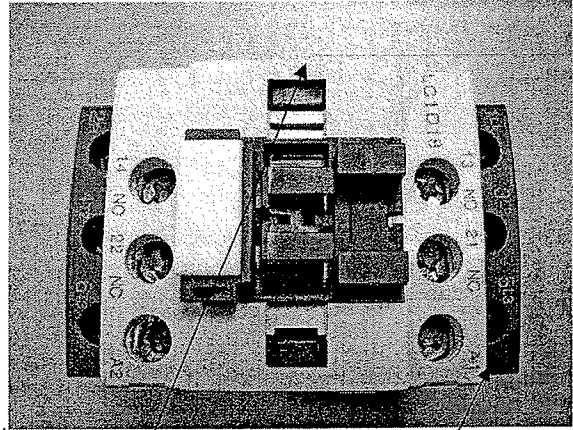


5

6

- 5. Telemecanique
- 6. Plant Code and Date Code.

No problem



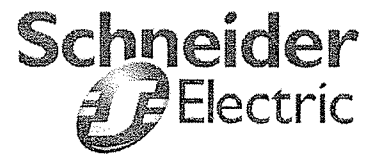
found.

7

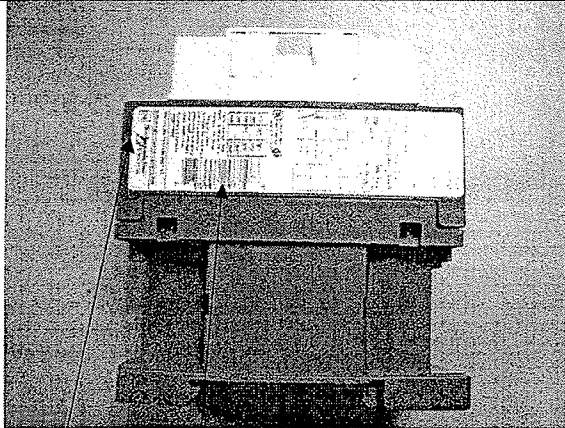
8

- 7. No Telemecanique
- 8. No Plant or Date Code.





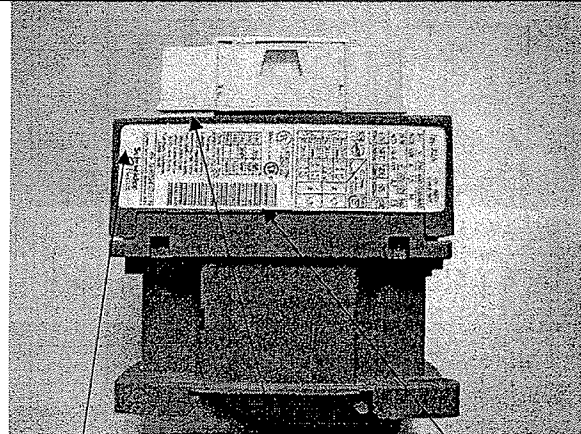
Page 4 – Device #4



9

10

9. Plant Code [24]  
10. Human readable bar code.

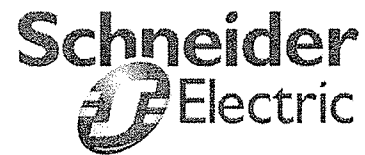


11

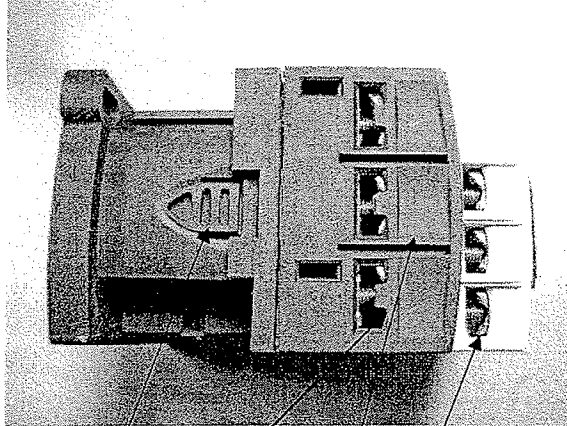
13

12

11. No Plant Code.  
12. Non human readable bar code.  
13. Poor fit.



Page 5 – Device #4



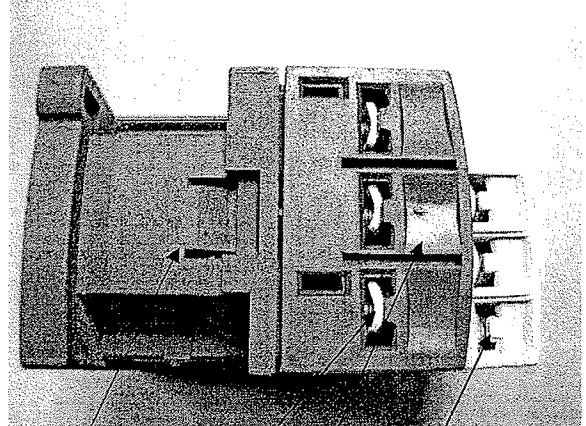
14

15

16

17

- 14. New style latch.
- 15. Wide wire clamp in OPEN position.
- 16. Matte surface.
- 17. No plastic tab, clamps OPEN.



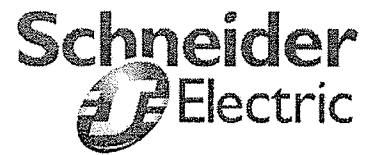
18

19

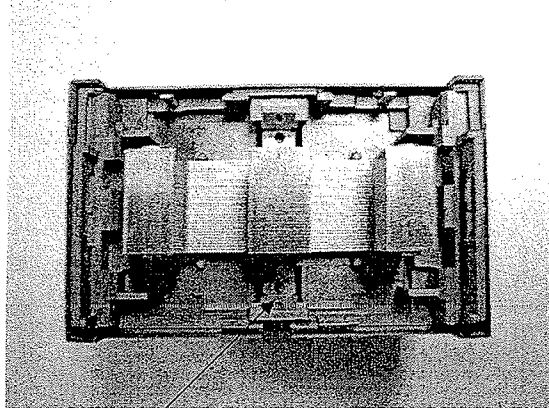
20

21

- 18. Old style latch.
- 19. Narrow clamp in CLOSED position.
- 20. Glossy surface.
- 21. Plastic tab, clamps in CLOSED position.

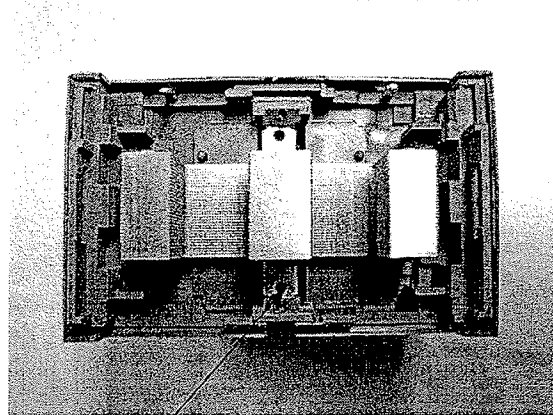


Page 6 – Device #4



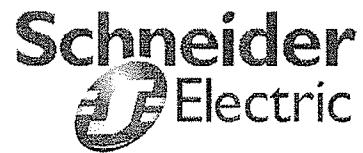
22

22. Copper color (phosphor bronze?) retaining strap.  
(Not Shown) – Slightly magnetic return spring, dull finish

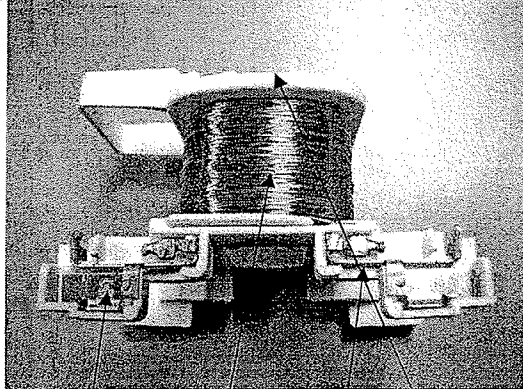


23

23. Silver color retaining strap.  
(Not Shown) – Magnetic return spring, gloss silver finish.

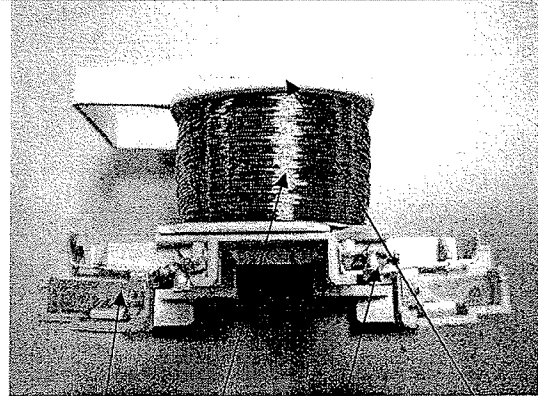


Page 7 – Device #4



24  
25  
26  
27

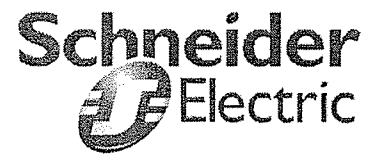
24. Numbers on terminal.  
25. RED magnet wire.  
26. Folded over weld tab.  
27. Thick bobbin.



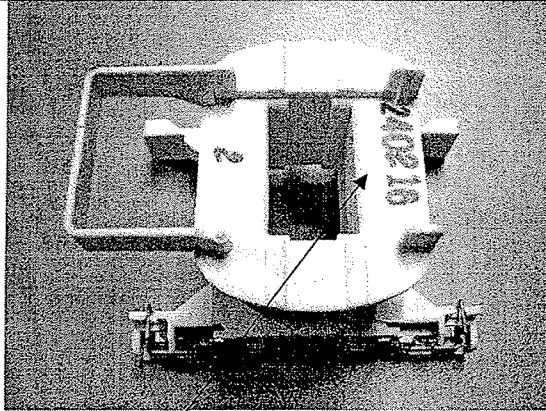
28  
29  
30  
31

28. No numbers on terminal.  
29. Copper color magnet wire.  
30. Non folded weld tabs.  
31. Thin bobbin.

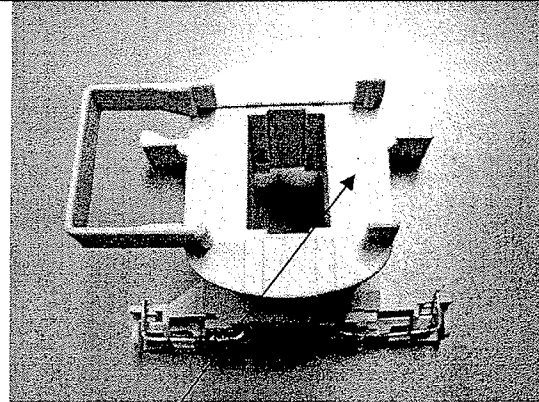




Page 8 – Device #4



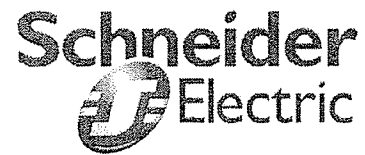
32



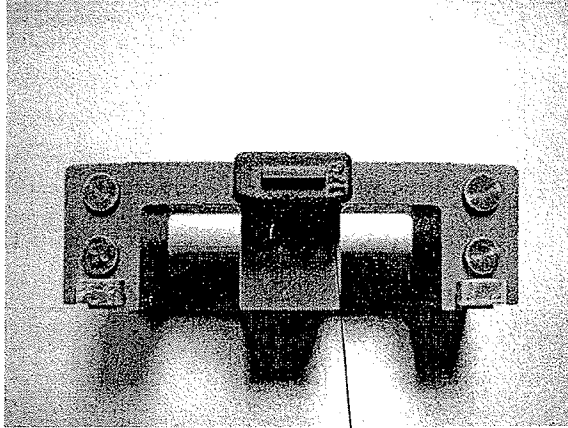
33

32. Plant & Date Code.

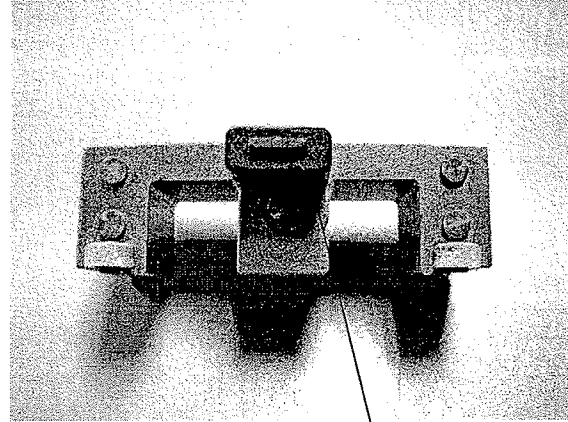
33. No coding.



Page 9 – Device #4



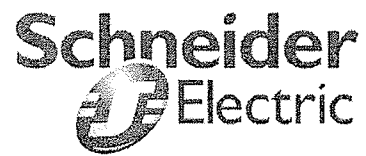
34



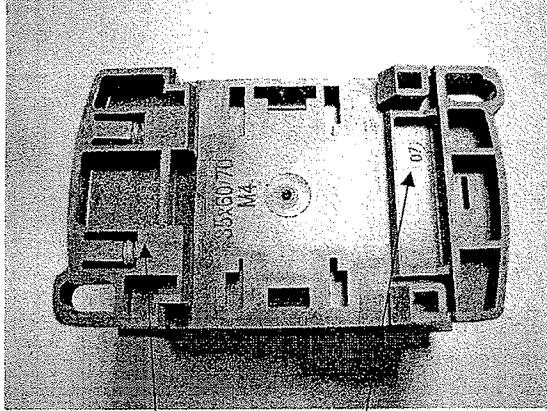
35

34. Three digit cavity no. – Sharp features.

35. One or two digit cavity no. Very dull features.



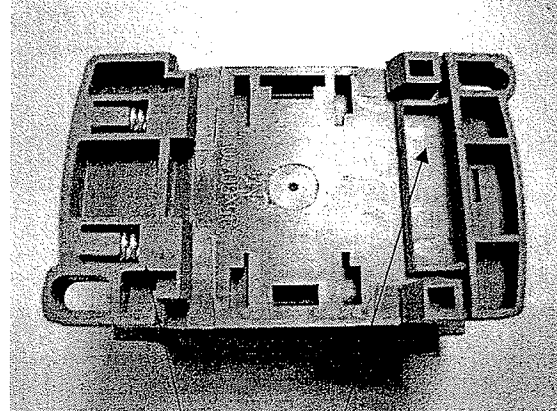
Page 10 – Device #4



36

37

36. Dull spring surface.  
37. Mold I.D.



38

39

38. Shiny plated springs.  
39. No mold I.D.